

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

PECOS RIVER TALC LLC,

Plaintiff,

v.

DR. THERESA SWAIN EMORY, DR.
RICHARD LAWRENCE KRADIN, AND
DR. JOHN COULTER MADDOX,

Defendants.

Civil Action No. 4:24-cv-75-JKW-RJK

**DEFENDANTS' MOTION TO COMPEL DISCOVERY RELATED TO WHETHER
REPEATED EXPOSURE TO COSMETIC TALC MAY CAUSE MESOTHELIOMA**

Pursuant to Federal Rules of Civil Procedure 26 and 37, Defendants Drs. Theresa Emory, John Maddox, and Richard Kradin (together, the “Doctors”) hereby move the Court to grant their Motion to Compel Discovery Related to Whether Repeated Exposure to Cosmetic Talc May Cause Mesothelioma. The reasons and authority for the Motion are set forth with particularity in the accompanying Memorandum.

Pursuant to Federal Rule of Civil Procedure 37(a)(1) and Local Civil Rule 37(E), the undersigned counsel certifies that counsel for Defendant Doctors conferred in good faith with opposing counsel before filing this motion.

Dated: May 13, 2025

Respectfully submitted,

By: /s/ Kathryn M. Ali
Kathryn M. Ali (VSB No. 97966)
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May, 2025, a copy of the foregoing has been filed electronically. Notice of this filing has been served upon counsel of record via the Court's electronic filing system. Access to this filing can be obtained via the Court's electronic filing system.

/s/ Kathryn Ali

Kathryn Ali